

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO:  ETHICON ELECTION WAVE (PTO 298) CASES LISTED IN PLAINTIFFS' EXHIBIT A</b>	

**NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING  
JOSEPH CARBONE, M.D. FOR ELECTION WAVE (PTO 298)**

Plaintiffs filed a Notice of Adoption (Dkt. 7274) as to the opinion testimony of Joseph Carbone, M.D. in the Election Wave (PTO 298) cases identified in Exhibit A to their Notice, adopting their Motion to Exclude Certain Opinions and Testimony of Joseph Carbone, M.D., Doc. No. 2025/2027 in Wave 1 and Reply (Doc. No. 3036) from Wave 3. In response, Defendants hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of Joseph Carbone, M.D. for Ethicon Wave 3 (Dkt. 2915) as their response for the Election Wave (PTO 298). Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 3 response briefing.

Respectfully submitted,

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Counsel for Defendants

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
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